



New Barnsbury Estate

Environmental Statement Review

November 2022

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Comments

Comments



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Introduction

Regulation 4(5) the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), (the 'EIA Regulations'), states that "the relevant planning authority or the Secretary of State must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement". On this basis, the London Borough of Islington (LBI) has appointed Waterman Infrastructure & Environment Limited (Waterman) to undertake an independent review of the Environmental Statement (ES) and subsequent ES Addendum submitted in support of the planning application for New Barnsbury, The Barnsbury Estate (P2022/1898/FUL).

The ES submitted in support of the planning application for New Barnsbury, The Barnsbury Estate (P2022/1898/FUL) on May 2022 was reviewed and a Draft ES Review Report was produced in September 2022. It is understood that the subsequent ES Addendum prepared by Trium in September 2022 has considered the comments and requests for clarification raised in the September 2022 Draft ES Review Report. Therefore, this document presents the outcomes of the review of the ES submitted in May 2022 alongside the ES Addendum submitted in September 2022, which together form the current Environmental Statement. For clarity this final review only sets out remaining issues identified in the Draft ES Review Report that have not been addressed by the September 2022 ES, and any additional concerns, comments or non-conformances identified within the September 2022 ES Addendum.

The review has been undertaken by a team of suitably qualified and experienced consultants.

This document presents the methodology followed for the review of New Barnsbury, The Barnsbury Estate ES and ES Addendum as well as the outcomes of the overall review.

Review Methodology

The review of New Barnsbury, The Barnsbury Estate ES and ES Addendum has comprised two stages. The first stage is focused on reviewing the compliance of the documentation against the Requirements from Schedule 4 of the EIA Regulations, the criteria followed during this stage is outlined Table 1. The second stage comprises the technical review – the findings of which are set out in Table 3.

Table 1. Criteria to review the ES against the Requirements from Schedule 4 of the EIA Regulations

Requirements from Schedule 4 of the EIA Regulations: Information for Inclusion in Environmental Statements	Section of the Environmental Statement to be reviewed against the requirement from Schedule 4 of the EIA Regulations	Criteria for reviewing the relevant section of the Environmental Statement against the requirement from Schedule 4 of the EIA Regulations
<p>1. A description of the development, including in particular:</p> <p>(a) a description of the location of the development;</p> <p>(b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;</p> <p>(c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;</p> <p>(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.</p>	ES Chapter 3: Alternatives and Design Evolution, ES Chapter 4: The Proposed Development and ES Chapter 5: Demolition and Construction.	<ul style="list-style-type: none"> Is there a description of the site / location and surrounding area where the development is proposed? Is there a description of the development, including dimensions, appearance and construction considerations? Is there a description of the operational development, including proposed uses? Is there a description of the anticipated residues and emissions to be produced as a result of the development?
<p>2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.</p>	ES Chapter 3: Alternatives and Design Evolution.	<p>Does ES Chapter 3: Alternatives and Design Evolution include information on the following points?</p> <ul style="list-style-type: none"> Have any other locations been considered for this development? Have any other design concepts been considered for this development? Are there any other ways of achieving the same development objectives? Has there been any consideration for different ways of building this development? Has there been any consideration regarding key environmental differences between alternatives for the development? Is there any justification for discarding other locations, designs or ways of building this development?
<p>3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.</p>	ES Chapter 6: Socio-Economics, ES Chapter 7: Traffic and Transport, ES Chapter 8: Air Quality, ES Chapter 9: Noise and Vibration, ES Chapter 10: Daylight, Sunlight and Overshadowing, ES Chapter 11: Wind Microclimate and ES Chapter 12: Climate Change.	<p>This requirement makes reference to the baseline sections of each of the technical topic chapters / assessments.</p> <ul style="list-style-type: none"> Do the ES chapters describe baseline (current state of the environment) accurately? Are there any omissions? Do the ES chapters describe the 'future' baseline (likely evolution of the current baseline without implementation of the development)?
<p>4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and</p>	ES Chapter 6: Socio-Economics, ES Chapter 7: Traffic and Transport, ES Chapter 8: Air Quality, ES Chapter 9: Noise and Vibration, ES Chapter 10: Daylight, Sunlight and Overshadowing, ES Chapter 11: Wind Microclimate, ES Chapter 12: Climate Change	<ul style="list-style-type: none"> Does the ES include a description of the factors likely to be significantly affected by the development (i.e., environmental topics scoped in)? Does each of the technical topic chapters / assessments include a description of what has been assessed? Does the scope include within each of the technical topic chapters / assessments

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landscape.	and ES Chapter 13: Effect Interactions.	<ul style="list-style-type: none"> correlate with the outcomes of the EIA Scoping Opinion? Is there any change mentioned in the ES which represent a change to the scope of any of the technical topic chapters / assessments?
<p>5. A description of the likely significant effects of the development on the environment resulting from, inter alia:</p> <p>(a) the construction and existence of the development, including, where relevant, demolition works;</p> <p>(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;</p> <p>(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;</p> <p>(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);</p> <p>(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;</p> <p>(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;</p> <p>(g) the technologies and the substances used.</p> <p>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC(88) and Directive 2009/147/EC(89).</p>	ES Chapter 6: Socio-Economics, ES Chapter 7: Traffic and Transport, ES Chapter 8: Air Quality, ES Chapter 9: Noise and Vibration, ES Chapter 10: Daylight, Sunlight and Overshadowing, ES Chapter 11: Wind Microclimate, ES Chapter 12: Climate Change, ES Chapter 13: Effect Interactions and ES Chapter 14: Likely Significant Effects and Conclusions.	<ul style="list-style-type: none"> Does each of the technical topic chapters / assessments identify which effects should be brought to the attention of the Local Planning Authority (LPA)? Does each of the technical topic chapters / assessments identify temporary construction/demolition effects identified? Are there any interim temporary assessment that have been considered, or should be as a result of phasing? Does each of the technical topic chapters / assessments identify permanent effects of the development (physical and operational)? Does the ES identify and appropriately assessed cumulative developments? Has climate change been considered, where relevant looking at potential future conditions? Does each of the technical topic chapters / assessments take into account the environmental protection objectives established at Union or Member State level which are relevant to the development?
<p>6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.</p>	ES Chapter 2: EIA Methodology, ES Chapter 6: Socio-Economics, ES Chapter 7: Traffic and Transport, ES Chapter 8: Air Quality, ES Chapter 9: Noise and Vibration, ES Chapter 10: Daylight, Sunlight and Overshadowing, ES Chapter 11: Wind Microclimate, ES Chapter 12: Climate Change and ES Chapter 13: Effect Interactions.	<p>This requirement makes reference to the methodology followed by each of the assessments undertaken, including any limitations.</p> <ul style="list-style-type: none"> Does ES Chapter 2: EIA Methodology describe the general approach to assigning sensitivity to receptors, magnitude to impacts and overall significance of effect? Do the ES chapters refer to ES Chapter 2: EIA Methodology or do they include a description of an alternative approach to assigning sensitivity to receptors, magnitude to impacts and overall significance of effect? Do the ES chapters include an explanation to distinguish between significant and not significant / insignificant effects? Do the ES chapters describe the forecasting methods and techniques used in the assessment of environmental effects resulting from the development? Are the described forecasting methods and assessment techniques correct and up to date? Do the ES chapters include any assumptions made for the assessment or any limitations identified? Are these clearly set out and legitimate?
<p>7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.</p>	ES Chapter 6: Socio-Economics, ES Chapter 7: Traffic and Transport, ES Chapter 8: Air Quality, ES Chapter 9: Noise and Vibration, ES Chapter 10: Daylight, Sunlight and Overshadowing, ES Chapter 11: Wind Microclimate, ES Chapter 12: Climate Change, ES Chapter 13: Effect Interactions and ES Chapter 15 Environmental Management, Mitigation and Monitoring	<ul style="list-style-type: none"> Does the ES in general, or any of the technical topic chapters / assessments, include a description of the intrinsic parts of the development design that will mitigate adverse effects? Does each of the technical topic chapters / assessments include a description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment? Do the proposed mitigation measures describe the extent to which significant adverse effects on the environment are avoided, prevented, reduced or offset, for effects resulting during both the construction and operational phases? Does the ES in general, or any of the technical topic chapters / assessments, include any proposed monitoring arrangements?
<p>8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information</p>	N/A. Directive 2012/18/EU addresses the control of major chemical accident hazards. Council Directive 2009/71/Euratom addresses	N/A – it is considered that this topic has correctly been scoped out of the EIA, as a result this is not included within the ES.

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available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU(90) of the European Parliament and of the Council or Council Directive 2009/71/Euratom(91) or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	the safety of nuclear installations. This refers to industries and activities that come under Control of Major Accident Hazards (COMAH) Regulations. COMAH mainly affects the chemical industry, but also some storage activities, explosives sites, nuclear sites and other industries, where threshold (and above) quantities of dangerous substances identified in the regulations are kept or used.	
9. A non-technical summary of the information provided under paragraphs 1 to 8.	NTS	<ul style="list-style-type: none"> Does the ES include a non-technical summary (NTS) providing a summary of the ES in a non-technical language?
10. A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	Entire ES.	<ul style="list-style-type: none"> Does the ES in general, and the technical topic chapters / assessments, include a reference list detailing the sources used for the descriptions and assessments included in the ES?

The technical review of the information presented in the ES aims to allow LBI to robustly determine the planning application in the knowledge of the project's likely significant effects on the environment. This stage has been focused on the adequacy of the information provided in the front- and back-end chapters of the ES, for example in relation to the description of the proposed development, alternatives, construction and cumulative effects, in addition to the technical topic chapters / assessments, including the associated technical appendices, NTS, cumulative effects and residual effects, methodology, approach and assumptions for assessing the environmental effects. A further cross check against the requirements of the LBI Scoping Opinion is also undertaken. Whilst the review draws on elements from guidance documents, such as the ES review criteria published by IEMA as part of the EIA Quality Mark scheme, our technical review of the information presented in the ES is based on professional experience to ensure the output is pragmatic, proportionate and focused.

The overall results from the review of New Barnsbury, The Barnsbury Estate ES have been presented with a 'grading system'. Table 2 illustrates the possible grades and the proposed criteria to assign these grades.

Table 2. Overall ES review Grading Criteria

Grades	Criteria
Pass	Meets requirements of the Regulations.
Issues to address	Likely meets requirements of the Regulations, further clarifications would improve legibility and understanding.
Fail	Likely falls short of requirements of the Regulations.

Summary of conclusions

Table 3 below summarises the outcomes of the overall review of New Barnsbury, The Barnsbury Estate ES, including recommendations where applicable.

Table 3. Summary of Review Outcomes

Section of the ES	Review of compliance	Technical Review	Overall Review Conclusion ('Grade')	Information to be provided under Regulations 25	Clarifications
Chapter 1: Introduction and the associated section of the ES Addendum. In accordance with Table 1.15 of the ES Addendum, the equivalent to the May 2022 ES Chapter 1: Introduction is an Addendum introduction section which has been provided within this September 2022 ES Addendum (within Volume 1, Main Report).	N/A	The table of Contents (Page 4 of the ES Addendum) only shows sections of the report up to page 18 out of the 122 pages of the document, which makes navigation of the document more difficult for the reader. There are some errors in the numbering presented for the annexes included within Table 1.15. The structure of the Addendum does not replicate that of the ES for the front-end Chapters (Chapters 1-5), this hinders the cross referencing of the text within the ES to that in the ES Addendum.	Pass	N/A	It would be useful if a corrected contents page could be provided to aid the reader.
Chapter 2: EIA Methodology and the associated section of the ES Addendum. In accordance with Table 1.15 of the ES Addendum, the	ES Chapter 2: EIA Methodology and the associated section of the ES Addendum are considered to be generally in compliance with the requirements of Schedule 4 of the EIA Regulations.	Table 1.2 of the ES Addendum indicates that "A full set of planning drawings which have been replaced and those that remain as per that assessed within the May 2022 ES is presented in the cover letter accompanying the revised planning application. The EIA team have either reviewed all or relevant planning drawings as appropriate to their assessment". However, the aforementioned cover letter is not included	Pass	N/A	Clarification with regards to the 'full set of planning drawings' used for the EIA / assessment of the Amended Proposed Development should be

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<p>equivalent to May 2022 ES Chapter 2: EIA Methodology is the addendum section outlining the Environmental Statement Addendum Approach which has been provided within this September 2022 ES Addendum (within Volume 1, Main Report, Introduction, ES Addendum Approach and Proposed Amendments).</p>	<p>This chapters includes a description of the general approach followed to assign sensitivity to receptors, magnitude to impacts (paragraphs 2.136 to 2.139) and overall significance of effect (paragraphs 2.140 to 2.143). The chapter also includes an explanation to differentiate between significant and not significant / insignificant effects (paragraph 2.150).</p> <p>This chapter includes a list of the principal assumptions and limitations made and identified for the EIA (Paragraph 2.155).</p> <p>A small number of observations with regards to the information presented and included in this chapter have been made for which clarifications in some cases have been requested. The majority of these are addressed in the ES Addendum. However, the identified clarifications should not alter compliance with Schedule 4 of the EIA Regulations.</p>	<p>within the ES Addendum documents. It is considered that this full list of planning drawings should have been provided within the ES Addendum to aid the reader.</p> <p>Minor inconsistencies and errors were noted in the ES, which have not been updated by the Addendum, these are as follows:</p> <p>Figure 2.1 of the ES (The Planning Application Boundary, defining Detailed and Outline Element) lacks a key / legend to fully understand what is described in Paragraph 2.5 ('Form of the Planning Application' Section).</p> <p>Heading levels within the ES do not appear to be formatted correctly within this chapter, which hinders the reader's understanding and the accessibility of this Chapter.</p> <p>Table 2.1 of the ES provides a list of the parameter plans being sought for approval for the Outline Element. It is understood that these plans are also used for the assessments reported in the ES. Paragraph 2.36 (Assessment of the Detailed Element of the Proposed Development) refers to "a full set of detailed planning drawings" however, these drawings are not listed in a similar manner to those included in Table 2.1.</p>			<p>provided within, or appended to the ES Addendum in order to aid the reader.</p>
<p>Chapter 3: Alternatives and Design Evolution and the associated section of the ES Addendum.</p> <p>In accordance with Table 1.15 of the ES Addendum, the equivalent to May 2022 ES Chapter 3: Alternatives and Design Evolution is the addendum section outlining the Environmental Statement Addendum Approach which has been provided within this September 2022 ES Addendum (within Volume 1, Main Report, Introduction, ES Addendum Approach and Proposed Amendments).</p>	<p>ES Chapter 3: Alternatives and Design Evolution and the associated section of the ES Addendum are considered to be generally in compliance with Schedule 4 of the EIA Regulations.</p> <p>This chapter includes a section covering the description of the 'Site and Surrounding Context' which complies with requirement No. 1 of the EIA Regulations. Notwithstanding, an observation has been made in this regard.</p> <p>An alternatives analysis comprising the 'Do-nothing / no Development Alternative, Alternative Sites and Alternative Designs, is presented.</p>	<p>It is considered that there are some sections and information presented in this chapter of the ES that would be better placed elsewhere, as they do not assist or contribute to the understanding of the alternatives and design evolution of the proposed development, but would aid the reader with respect to their understanding of the site and it's context.</p> <p>In particular, it seems unusual for the information regarding the location of the site and the description of the surrounding area (paragraph 3.2 to 3.38) to be included within this chapter. This information could have been better included as a separate chapter or as part of either Chapter 1 (Introduction) or Chapter 4 (Proposed Development). In addition, it is also noted that this chapter (under 'Site Description') repeats some of the information already provided within ES Chapter 1 Introduction, 'site information' section.</p> <p>The 'Consultation' section is very detailed. 'Consultation' as a requirement of the EIA could have been better included as part of ES Chapter 2: EIA Methodology with a short summary included in this chapter to describe the changes applied to the proposed development, or the scope / methodology of the EIA as a result of the consultation undertaken. Much of the information included is irrelevant to alternatives or design evolution, and in the interests of a more proportionate ES could have been included as an appendix.</p> <p>It should be noted that the Figure 3.8 referred to in paragraph 3.91 is likely a typographical error as it refers to 'the emerging masterplan', Figure 3.7.</p> <p>The Addendum makes no significant changes to the consideration of Alternative to that set out in the ES.</p>	Pass	N/A	None
<p>Chapter 4: The Proposed Development and the associated section of the ES Addendum.</p>	<p>ES Chapter 4: The Proposed Development and the associated section of the ES Addendum are considered compliant with Schedule 4 of the EIA Regulations.</p>	<p>The ES chapter has included some information from other chapters (such as the overview of the planning application), the repetition and duplication does not aid the legibility and adversely impact on the proportionality of the ES.</p>	Pass	N/A	<p>It would be helpful if errors could be corrected by way of an erratum / corrigendum to aid the</p>

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<p>In accordance with Table 1.15 of the ES Addendum, the equivalent to May 2022 ES Chapter 4: The Proposed Development is the addendum section outlining the Proposed Amendments which have affected the development as previously detailed within the May 2022 Environmental Statement, which has been provided within this September 2022 ES Addendum (within Volume 1, Main Report, Introduction, ES Addendum Approach and Proposed Amendments).</p>	<p>The general description of the location of the site / proposed development has been included in Chapters 1 and 3.</p> <p>The ES chapter and the associated section of the ES Addendum include the description of the development (outline and detailed elements), including dimensions (quantum, scale, site layout and general arrangement), phasing and appearance.</p> <p>The ES chapter and the associated section of the ES Addendum also include a description of the operational development, including proposed uses, access, parking and servicing.</p>	<p>It is considered that for the ease of the reader the general description of the location of the site / proposed development which has been included in Chapters 1 and 3 would be better reported within this chapter or as a separate ES chapter.</p> <p>There are a number of minor typographic errors, particularly incorrect cross references within the text that make it more difficult for the reader to understand. Whilst these do not materially impact on the functionality of the ES it would be helpful if these were addressed by way of an erratum / corrigendum. These have not been directly updated by the Addendum and examples are set out below:</p> <ul style="list-style-type: none"> • The reference to Table 4.6 in Paragraph 4.15 is incorrect and should be Table 4.5. • Paragraph 4.23 is missing some of the Proposed Quantum of Development included in Table 4.1. • Paragraph 4.72 is missing a sentence at the beginning (likely to be 'Figure 4.10 or BAE-PTE-ZZ-XX-DR-A-100098-C1 – Basement Plan'). • The reference to Figure 4.24 in paragraph 4.88 is not correct as this should refer to Figure 4.23. • The reference to Figure 4.25 in paragraph 4.92 is not correct as this should refer to Figure 4.24. • The key is missing in Figure 4.23. • Paragraph 4.118 is missing a sentence at the beginning (likely to be a reference to a figure or a plan). • The reference to Figure 4.37 in paragraph 4.124 is not correct – The plan referred to does not seem to be presented within the chapter. • The reference to Figure 4.38 in paragraph 4.129 is not correct as this should refer to Figure 4.37. <p>There are also a number of typographic errors in the ES addendum which would benefit from being corrected in an erratum, examples include the following:</p> <ul style="list-style-type: none"> • There is an inconsistency between Paragraph 1.40 and Tables 1.3 and 1.4 – i.e., whilst Table 1.3 sets out the amount of development per use class for the Detailed Element of the Amended Proposed Development, compared against the May 2022 ES (instead of the Outline Element). • There is a reference missing in the last sentence of Paragraph 1.44. • Figure 1.15 is missing a key or legend to facilitate the reader's interpretation of the information presented. • Table 1.14 has carried over the 'detailed' heading over the totals, which can be misleading or confusing for the reader. • There is an error with the figure reference included in Paragraph 1.98 which should be Figure 1.17 instead of Figure 1.16. 			<p>reader.</p>
<p>Chapter 5: Demolition and Construction and the associated section of the ES Addendum.</p> <p>In accordance with Table 1.15 of the ES Addendum, the equivalent to May 2022 ES</p>	<p>Overall, ES Chapter 5: Demolition and Construction and the associated section of the ES Addendum are considered to be compliant with Schedule 4 of the EIA Regulations.</p> <p>The ES chapter the associated ES</p>	<p>Overall, the chapter and ES Addendum provide an adequate description of the demolition and construction works. This includes the anticipated programme of works, the phasing and rehousing strategy, the construction sequencing, the description of the proposed works, the materials to be used and waste likely to be generated. It also provides information pertaining to site access and egress for vehicles and pedestrians, plant equipment, anticipated hours of work, communication</p>	<p>Pass</p>	<p>N/A</p>	<p>The provision of a fuller description of the land uses during the construction and demolition phases, ideally with a plan, setting out the location of compounds and laydown areas would aid</p>

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<p>Chapter 5: Demolition and Construction is the addendum section confirming that the demolition and construction assessment outlined within the May 2022 Environmental Assessment remains unchanged, which has been provided within this September 2022 ES Addendum (within Volume 1, Main Report, Introduction, ES Addendum Approach and Proposed Amendments).</p>	<p>Addendum section lack some relevant construction details, for example where site compounds, laydown areas would be located. There is not figure or plan to illustrate these expected land uses during the demolition and construction.</p> <p>It is considered that it would have been helpful if assumptions pertaining to slippage of the programme, or works commencing later in the period permitted by any planning permission were included.</p> <p>The above identified missing information should however not alter compliance with Schedule 4 of the EIA Regulations.</p>	<p>strategy and mitigations/control measures.</p> <p>Nevertheless, a small number of clarification and observations with regards to the information presented and included in this chapter would be useful. It should be noted there are a number of typographic that could also be addressed to aid the reader.</p> <p>Whilst Table 1.2 of the ES Addendum has provided some further description to accompany Figures 5.6 to 5.11 of the May 2022 ES, these descriptions have only covered some elements illustrated in these figures, and there are some typographical errors which hinder the cross referencing between the text in the ES Addendum and the figures from the May 2022 ES.</p>	<p>Pass</p>	<p>None</p>	<p>the readers understanding.</p> <p>Corrections to the inconsistencies noted between the construction phases text and tables have not been made. It would have been useful if an amended anticipated programme of works had been provided in the ES Addendum.</p>
<p>Chapter 6: Socio-Economics and ES Addendum Section</p>	<p><i>Chapter 6: Socio-Economics</i> and the associated Addendum Section appears to be compliant with the regulatory requirements. The data sources and technical assessment methodologies are up-to-date and have been justified.</p>	<p>The baseline references a variety of datasets that mostly appear to be the latest available at time of drafting. However, there are few minor clarifications to be made in this regard.</p> <p>The rate of unemployment and economic activity has been estimated using 2011 Census data. Whilst it is acknowledged that this is the most recent data that is available for the Local Area, the Annual Population Survey could provide more up-to-date data for LBI and London.</p> <p>There is a small inconsistency in the stated provision of open rooftop space between Paragraph 1.82 (of the ES Addendum) (under 'Open Space' Section) and Paragraph 6.23 (of the ES Addendum) (under the Implications of the Proposed Amendments Section) of the Addendum. The increase in open rooftop space would be 191m², instead of 181m². This seems to be correct in Paragraph 6.33.</p> <p>Whilst it is not a change from 'Not Significant' to 'Significant', Paragraph 6.41(of the ES Addendum) could have referred to the only change in residual effects – i.e., the demand and provision of playspace, for the ease of the reader.</p> <p>A variety of assumptions and limitations have been presented within the chapter which appear legitimate and well justified. Effects are clearly identified for both during demolition and construction and after delivery has been completed, with impacts assessed in terms of sensitivity, magnitude, nature and scale.</p> <p>It is not clear what Paragraph 6.43 of the ES Addendum is referring to with <i>"the impacts of climate change discussed in relation to socio-economics are not affected by the Amended Proposed Development"</i>. Climate change had not been included in the original ES Chapter 6: Socio-Economics and this is the only mention to climate change in the Addendum Section for Socio-Economics. As previous noted, there should be at least a qualitative assessment of the potential implications of climate change on socio-economic, this may however sit better in Chapter 12 Climate Change.</p> <p>Contrary to the statement included in Paragraph 1.10, the Addendum</p>	<p>Pass</p>	<p>None</p>	<p>Clarifications as to how the socio-economic receptors are impacted by climate change, and the effects of climate change are mitigated. This is not explicitly included within the ES, although assessments within the ES, and in support of the Application to take this into consideration.</p> <p>Clarification as to how the cumulative effects of the Completed Development on 'Housing Delivery' and 'Local Expenditure' have been calculated is required.</p>

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		<p>Section is missing the heading for the 'Assessment of the Future Environment' and there is no mention to 'Evolution of the Baseline Scenario' (included in the original ES Chapter), even to state, as in other sections, that there are no changes compared to the May 2022 ES.</p> <p>Paragraph 6.49 reports a change from 810 net new homes to 70 net new homes resulting from the completed Amended Proposed Development. However, it is not clear how this has been calculated if as stated in Paragraph 6.23, <i>"the implications of the Amended Proposed Development on the socio-economic assessment relate to a decrease of 36 residential units from 950 to 914"</i>. This seems to be a significant change, which would change the assessed effect on the original May 2022 ES (i.e., direct, permanent, moderate beneficial (significant) effect on housing need at the Borough level). The net new homes figures reported in Paragraph 9.50 do not match those in the preceding paragraph, although they do indicate that there is a typographic error in the preceding paragraph. Further to this it is also not clear how the decrease in household spending per annum has been calculated (£1 million decrease seems disproportionate when compared to the reduction in net new homes). Despite these errors, it is considered that the changes to the scheme, and consequently expenditure are likely to be insignificant with regard the overall scale of the proposals, and therefore the assessment as reported is likely accurate.</p> <p>As previously noted, Paragraph 6.175 of the original ES Chapter states that <i>"a significant beneficial effect in relation to open space provision was identified when considering the combination of Old and New Barnsbury under the Tier 1 Cumulative Assessment"</i> however this is not consistent with Table 6.16 which also identified this beneficial significant effect without establishing any association with the Tier 1 Cumulative Assessment. This narrative is also inconsistent with paragraph 14.18 of ES Chapter 14: Likely Significant Effects and conclusions. The associated Addendum Section has not clarified this point.</p> <p>The conclusion reported in Paragraph 6.51 (under 'Likely Significant Effects' needs to be reviewed in light of the above comments, particularly in relation to the previously identified significant cumulative effect on the housing delivery.</p>			
Chapter 7: Traffic and Transport and ES Addendum Section	The Traffic and Transport Chapter and the associated Addendum Section are considered to be compliant with the requirements of Schedule 4 of the EIA Regulations as set out in Table 1 above.	<p>Subject to the findings of an independent review of the Transport Assessment (TA) and supporting documentation submitted in support of the planning application, the information presented within Chapter 7 of the May 2022 ES and Addendum Section is assumed to be accurate and fit for purpose.</p> <p>There is an error with the numbering of paragraphs in this Addendum Section, as this does not continue the numbering from the previous section (Socio-Economics), which mirrors the paragraph numbering of the ES, instead all paragraphs for this section revert to 1.XX format. It would be beneficial for the ease of the reader if this was amended/corrected, particularly as the table captions and references in the text are not aligned. There are also further typographic errors that hinder the reader throughout this section of the Addendum.</p> <p>Contrary to the statement included in Paragraph 1.10, the Addendum Section has included a section: 'Legislation, Planning Policy and Guidance' which was not part of the original May 2022 ES Chapter.</p>	Pass	None	It would be helpful to the reader if a replacement was made to section 7 of the Addendum to correct the erroneous paragraph and table numbering. Whilst this error has no material effect upon the findings presented, it does make the Addendum difficult to read.

Section of the ES	Review of compliance	Technical Review	Overall Review Conclusion ('Grade')	Information to be provided under Regulations 25	Clarifications
		<p>The information included between paragraphs 1.7 and 1.15 relates to the changes introduced by the Proposed Amended Development and does not describe the 'Assessment Methodology' for Traffic and Transport. As such this information should have probably been included in the Introduction Section.</p> <p>There is no mention as to whether the 2030 construction traffic AAWT has remained the same or not. Furthermore, Paragraph 1.28 states that "Table 7.3 supersedes Table 7.18 of the May 2022 ES Chapter" (it is assume that this is a typographic error and this paragraph refers to Table 1.3 of the Addendum Section for Traffic and Transport), although Table 1.3 of the Transport Section of the Addendum does not seem to show the same information as table 7.18 of the ES. Notwithstanding this, given the relatively small changes to the proposals and programme is it considered unlikely that these data have changed, and this seems to be set out in table 1.4 of the Addendum.</p>			
Chapter 8: Air Quality and ES Addendum replacement chapter.	The May 2022 ES Chapter 8: Air Quality and the ES Addendum replacement chapter are considered to be compliant with Schedule 4 of the EIA Regulations.	<p>The construction assessment methodology generally follows recognised and best practice guidance, except for the emission factor toolkit (EFT) used. The road traffic emissions from construction traffic and the completed and operational development used Version 10 of the EFT (published August 2020). It was understood that this had been addressed. However, in paragraph 8.30 of the ES Addendum states that the out of date EFT Version 10.1 was used.</p> <p>No information is provided on the ADMS model inputs: for road type.</p> <p>Surface Roughness in Annex 7 is stated as 1 for the local area and 0.5 for the met station. The site is located in a large urban area and should use a value of 1.5. Value of 0.5 (parkland and open suburbia) was used to represent the met station. A surface model roughness of 1.5 should be applied to Large Urban Areas. LBI is a central London Borough and should be classified as a large urban area.</p> <p>LAQM TG16 recommends the use of multiple monitors for model verification and recommends against the use of one monitor. The use of one monitor to derive the adjustment factor for a model is not recommended as the monitoring site may not be representative of other locations modelled, and the adjustment factor derived will be heavily dependent on the source-to-receptor relationship as represented by the meteorological data file used in the dispersion model. The model verification only has one DT in the model verification. The AQ consultant stated: <i>'it is acknowledged that in accordance with LAQM.TG22 model verification should be undertaken using multiple monitoring locations, however traffic data was only made available for links where one monitoring location was - BIS005/03 Caledonian Road. See Section 8.36. This is considered to be a reasonable approach and therefore provides a robust assessment'</i>.</p>	Pass		<p>Clarification of the EFT Version used for construction traffic assessments should be provided by way of an erratum.</p> <p>Clarification on the 'road type' input into the ADMS-Roads model should be provided.</p> <p>In isolation, the use of a surface roughness of 1 for the local area would not alter the conclusions of Chapter 8 Air Quality, however, further justification for this approach would aid the reader.</p> <p>It is advised LBI apply a condition for monitoring to ensure the pollutant concentrations predicted in the modelling are accurate and existing and future receptors are not exposed to poor air quality.</p>

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		<p>The use of one monitor for model verification does not comply with best practice guidance and therefore does not provide a robust assessment. In isolation, the use of a one monitor in the model verification would not be likely to alter the conclusions of Chapter 8 Air Quality.</p> <p>Defra background map concentrations used instead of available continuous background monitors. The AQ consultant stated: <i>'Background concentrations have been taken from Defra, rather than the local monitoring station (Arsenal) as Defra background concentrations were higher than those measured locally, therefore a worst case approach has been established'</i>. The use of higher background concentrations in the baseline year is not necessarily a conservative approach. The inverse is often true as the higher the background value used, the lower the monitored traffic NOx emission contribution that is run through the NOx to NO₂ calculator to inform the model verification and adjustment exercise. This can lead to a lower adjustment factor and therefore a less conservative set of predicted results in the opening year. However, the use of Defra background maps is considered acceptable in this assessment.</p> <p>Whilst not formally a part of the Environmental Statement, the air quality neutral calculations have been based on GLA's consultation draft of London Plan Guidance; Air Quality Neutral. To calculate the transport emissions the AQ consultant has used GEA rather than GIA as presented in the Guidance. Using GEA is incorrect and exaggerates the results of the Air Quality Neutral Calculations. Additionally, the AQ Neutral calculations use the Proposed Maximum Quantum of Development, which further exaggerate the results of the AQ Neutral calculations.</p> <p>In accordance with the GLA's consultation draft of London Plan Guidance; Air Quality Neutral the development should be tested against the TEB at the outline application stage, and again as detailed plans for each phase are brought forward.</p> <p>AQ neutral calculations should be undertaken for the detailed elements of the Development.</p> <p>The SB 1km buffer illustrated on Figure 8.4 of the ES Addendum is incorrect. The key on figure 8.8 of the Addendum is also incorrect.</p>			<p>It is suggested LBI apply a condition to ensure each phase of the Development would have air quality neutral assessment undertaken.</p> <p>Whilst the errors on the figures do not change the findings reported, it would be helpful if updated and corrected figures were provided.</p>
Chapter 9: Noise and Vibration and ES Addendum Section	The May 2022 Noise and Vibration ES Chapter and ES Addendum Section are compliant with Schedule 4 of the EIA Regulations.	<p>The chapter is considered to accurately present the baseline climate, operational and construction effects, mitigation measures and residual effects.</p> <p>The observations and clarifications previously raised in the ES Review have been adequately addressed. There are no further comments.</p>	Pass	None	None
Chapter 10: Daylight, Sunlight and Overshadowing and ES Addendum replacement	Overall, the Chapter 10: Daylight, Sunlight and Overshadowing replacement chapter, as set out in the ES Addendum is	A number of clarifications were sought in the initial review of the May 2022 ES (as presented in the Draft ES Review Report).	Pass	None	None

Section of the ES	Review of compliance	Technical Review	Overall Review Conclusion ('Grade')	Information to be provided under Regulations 25	Clarifications
chapter.	considered to be compliant with the requirements of Schedule 4 of the EIA Regulations as set out in Table 1 above.	<p>The responses provided within the ES Addendum are considered acceptable, apart from the considerations within the assessment for some more localised comparable studies (as per the London Plan). Whilst a response has been provided, in terms of size we would not agree that Elephant Park and Aldgate City are comparable, as these schemes comprised some significantly taller elements compared to the development, and the local context of these schemes already contains high rise buildings. We suggested that the author provided more localised examples, as this may help LBI draw direct comparability from their own previous decisions and be reassured there is some precedence within the Borough, not just London in general. It may be useful for officers to know that LBI have consented several schemes that target VSC values in the 'mid teens', indeed this approach was taken (and echoed by the Mayor) in the pre-SPG decision at Monmouth House, Islington (see P2015/3136/FUL).</p> <p>It has not been possible to verify the assumptions that have been made to model the rooms within the neighbouring buildings. Whilst the NSL contours would provide greater certainty on the findings and significance criteria applied, LBI may be minded to accepting the conclusions based on the tabular results alone.</p> <p><u>General review of methodology and approach in accordance with policy and BRE Guidance</u></p> <p>The Addendum ES clarifies that the BRE Guidelines 2011, which the May 2022 ES Chapter was based on, have been superseded and replaced by the 2022 edition. Although, it is worth pointing out that the assessments used for assessing impact on neighbouring amenity (VSC, NSL (daylight) and APSH (sunlight)) has not changed. Furthermore, the conventional significance criteria shown in table 10.6 has also not changed. The updated BRE Guidelines also includes an assessment methodology for assessing the impact on existing solar panels to neighbouring receptors, which was not in the 2011 BRE, however this is further covered in section 5 'Review of findings in respect of impact on solar panels'.</p> <p>Overall, it is felt that Point 2 have accurately set out the various assessment daylight and sunlight methodologies and their approach to defining significant effects.</p> <p><u>Review of the findings in respect of the moored boats</u></p> <p>We agree with Point 2's findings that there would not be a significant effect on the levels of light received by the moored boats as a result of the proposed development. Given that they are not permanent dwellings, as they can only stay moored for 7 days, any reduction in daylight is largely irrelevant as no occupier would be in residency for long enough to 'notice' a change. When turning to the retained daylight levels, the analysis shows retained VSCs upward of 20%, which is good for an urban locality.</p> <p><u>Review of findings in respect of overshadowing to front gardens at along Charlotte Terrace.</u></p> <p>We agree with Point 2 that front gardens are not usually assessed. The BRE Guidelines is also quite clear in its advice:</p>			

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		<p>“Around housing, front gardens that are relatively small and visible from public footpaths should be omitted; only the main back garden should be analysed [emphasis added]” (Paragraph 3.3.8, BRE Guidelines 2022)</p> <p>In approaching the question of whether there will be a significant effect, less weight should be given to these spaces, as they do not strictly fall within default BRE testing parameters.</p> <p>Point 2 note that some of the impacts amount to ‘Major Adverse’ and are therefore significant. Point 2 go on to say that the impacts can be considered acceptable as they have run an additional test 9 days after the Spring Equinox, when the sun travels at a slightly higher altitude. They have also tested the gardens in June, which shows they will receive good levels of sunlight in the summer. We agree with Point 2 that these impacts can be considered acceptable.</p> <p><u>Review of findings in respect of solar panels</u></p> <p>Point 2 have correctly undertaken the initial BRE recommended assessment of checking whether the APSH reaching the panels is not reduced by more than 10% compared to the existing baseline. The analysis shows that the greatest reduction is around 6%, meaning further detailed checks of solar irradiation are not required and the proposed development should not materially affect the amount of energy the panels can produce.</p> <p><u>Review of findings in respect of Light Pollution</u></p> <p>Point 2 have undertaken a qualitative assessment of light pollution and not any detailed technical tests.</p> <p>We agree with Point 2’s findings, that any light pollution is likely to be negligible and can be managed through the detailed design stage of the wider outline.</p> <p>This is because residential led developments do not tend to cause artificial light spill into other habitable properties; naturally so as residents are likely to close their curtains when it is dark in any event. Light pollution can usually only be an issue where a proposed development is a commercial property predominantly comprised of glass facades; that way, more artificial light can spill out from the building, compared to smaller windows used for residential purposes.</p> <p>We understand there are some ‘non-residential’ components of the proposal, however, we agree that any potential light spill can easily be mitigated through the use of automatic lights/blinds, and the after-hours use of those elements would likely be limited in any event.</p>			
Chapter 11: Wind Microclimate and ES Addendum Section	Further assessment and clarifications have been provided that address issues identified in the draft ES review. Subject to ensuring the delivery of required mitigation, potentially by the attaching of a suitably worded condition to the planning permission, the May 2022 ES Chapter 11: Wind Microclimate and the ES Addendum Section are considered to be compliant with the requirements of Schedule 4 of the EIA	<p>The overall assessment methodology, comprising Computational Fluid Dynamics (CFD) modelling in conjunction with long-term wind statistics applicable to the Site and the industry standard Lawson criteria for pedestrian comfort and safety, is considered appropriate for the scale of the proposed development.</p> <p>The May 2022 ES chapter and the ES Addendum Section are considered to accurately present the baseline climate, operational and construction effects, mitigation measures and residual effects. Whilst additional</p>	Pass		<p>Further justification as to why CFD was chosen for the assessment, rather than wind tunnel testing would aid understanding.</p> <p>For the outlined elements, the limitations on potential entrance locations or</p>

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	Regulations as set out in Table 1 above.	testing has been undertaken, no further likely significant effects are identified, therefore the findings set out in the May 2020 ES remain valid.			requirements for recessing (including the recommended minimum depth) should be clarified, or a mechanism for the incorporation of mitigation – such as a planning condition for testing of all Reserved Matters proposals – would ideally be set out.
Chapter 12: Climate Change and ES Addendum Section	Subject to further information and clarifications, the May 2022 ES Chapter 12: Climate Change and the ES Addendum Section are considered to be compliant with the requirements of Schedule 4 of the EIA Regulations as set out in Table 1 above.	<p><i>Part A Greenhouse Gas Emissions Assessment</i></p> <p>Assumptions and Limitations</p> <ul style="list-style-type: none"> The IEMA guidance champions a whole life approach to assessing carbon emissions and states that life cycle modules can be excluded if in accordance with the materiality and cut-off guidance i.e., expected emissions are less than 1% of total emissions with all exclusions not exceeding 5% of total emissions. Further information has been provided in this regard which, whilst not strictly in line with IEMA guidance, is reasonable and will unlikely result in any material change to the assessment. Whilst Table 12.1 of the ES Addendum indicates that “Figure 12.14 will be updated to reflect inconsistencies”, an update of this figure (table) has been omitted. <p><i>Part B Climate Change Resilience and Adaption</i></p> <p>The applicant has provided a technical appendix to support the assessment setting, Climate Change Technical Note London. The note provided guidance to the EIA technical team on how to consider effects under future climate scenario, ensuring it is integral to the design process. This has then driven the impacts section of the assessment, where different topics have considered impacts and any proposed mitigation. One query is around socio-economics where, potential effects related to climate change are not relevant to the assessment of socio-economic effects. It has been confirmed that there has not been direct assessment of climate with respect to socio-economic receptors, although there is a mechanism for this to be considered through industry standard design guidance and practice at reserved matters.</p> <p>Overall, it would have been useful for the reader if (where relevant) the information provided in the form of responses to requested clarification in Table 12.1 had been also discussed in the equivalent sections of the ES Addendum.</p>	Pass		As previously requested in the Draft ES Review, given that any emissions released will remain in the atmosphere irrespective of the source, clarification as to why certain effects resulting from the Proposed Development are considered temporary should be given.
Chapter 13: Effect Interactions and ES Addendum Section	ES Chapter 13: Effect Interactions and the ES Addendum Section are considered to be generally in compliance with Schedule 4 of the EIA Regulations as set out in Table 1 above.	<p>Given that each of the relevant chapters of the ES have already set out the relevant aspects of the current state of the environment (baseline scenario), it is concluded that this chapter is not strictly necessary to meet the requirements of the Regulations.</p> <p>The Addendum highlights where changes in the predicted significant</p>	Pass	None	Further clarification as to how the new identified receptors for the Effects Interactions assessment are not expected to experience an effect

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		<p>effects have been reported, and goes on to set out whether these change the magnitude and significant of interactions. No changes to the previously reported findings are identified.</p> <p>The ES Addendum Section identifies two new receptors to be considered within the Effects Interactions assessment, although it also states that <i>"there is no identified potential for effect interactions"</i>. Nevertheless, no justification is given for this.</p> <p>The numbering of this section of the Addendum is incorrect, restarting at 1 again, which is unhelpful.</p>			<p>interaction.</p> <p>It would aid the reader if the numbering of the paragraphs in this section was updated.</p>
<p>Chapter 14: Likely Significant Effects and Conclusions and ES Addendum Section</p>	<p>ES Chapter 14: Likely Significant Effects and Conclusions and the ES Addendum Section are considered to be generally in compliance with Schedule 4 of the EIA Regulations as set out in Table 1 above.</p>	<p>It understood that this chapter provides a summary of the likely residual significant environmental and socio-economic effects pertaining to the Proposed Development (from both construction and demolition and once the development is completed and operational), however this should have been clearly explained in Paragraph 14.1 of the May 2022 ES and the ES Addendum Section.</p> <p>As previously noted in the Draft ES Review, the May 2022 ES Chapter and the ES Addendum Section continuously refers to 'Likely Significant Effects' which might be misleading if the above point is not clarified – i.e., in reality only likely residual significant effects are being reported in this chapter, as opposed to all likely significant effects.</p> <p>There is an inconsistency between the loss of daylight amenity effect on Canal boats along Regents Canal reported as 'significant' under Paragraph 1.6 and reported as not significant in Table 10.13. Also in line with this, ES Chapter 2: EIA Methodology (Paragraph 2.149) defines residual effect as <i>'those effects which remain following the implementation of suitable mitigation measures'</i>, however, this chapter refers back to mitigation measures in several instances (such as paragraphs 14.12, 14.13, 14.23, 14.24 and 14.27). This also applies to Paragraph 1.7 of the ES Addendum Section. This seems to deviate from the factual purpose of the chapter.</p> <p>In addition, a number of minor inconsistencies and errors are noted in the May 2022 ES as follows, which have not been corrected by way of the Addendum:</p> <p>For clarity, Daylight, Sunlight and Overshadowing should be listed under Paragraph 14.8 as a topic area which has been assessed within the EIA and for which no significant demolition and construction effects have been identified.</p> <p>There is an inconsistency between the 'scale' of effect assigned to the likely significant effect on Climate Change – Global Climate from the demolition and construction of the Proposed Development reported in Table 14.1 (i.e., Moderate Adverse) and the same effect as reported in Table 12.14 of ES Chapter 12: Climate Change (i.e., Major Adverse).</p> <p>Paragraph 14.11 states that <i>"within the Outline Element, the Proposed Development re-provides commercial space along Caledonian Road which would be suitable for existing tenants to relocate into"</i>, however this is not been mentioned in ES Chapter 6: Socio-Economics (Paragraphs 6.151 and 6.152) and would appear to suggest that indirect mitigation is provided (speculative), whereas ES Chapter 6 states that "this level of</p>	<p>Pass</p>	<p>None</p>	<p>It would aid the reader if the numbering of the paragraphs in this section was updated.</p>

Section of the ES	Review of compliance	Technical Review	Overall Review Conclusion ('Grade')	Information to be provided under Regulations 25	Clarifications
		<p>detail is not yet known at this stage" when referring to the mitigation for 'Displacement of existing businesses and their employees'.</p> <p>The geographic extend for the significant effect on 'access to and provision of open space' appears as 'borough' in Table 14.2 but this is not the case in Table 6.16 of the ES Chapter 6: Socio-Economics.</p> <p>There is an error in Paragraph 14.17 where 'Noise' is listed a topic for which likely significant effects have been identified. Noise should be listed under Paragraph 14.16 instead.</p> <p>Similarly, Climate Change has not been listed under Paragraph 14.17, although it is then included in Table 14.2 and further discussed in Paragraph 14.32.</p> <p>There is also a cross-referencing error in Table 14.2 at the end of the text included for Wind Microclimate.</p> <p>Lastly, the Summary and Conclusions Section does not present the information from the rest of the chapter in a logical chronological order (i.e., first demolition and construction and then the completed and operational development) and repeats some of the points in several paragraphs (such as the effect on the housing market).</p> <p>Changes in the effects are highlighted in the ES Addendum.</p> <p>The numbering of this section of the Addendum is incorrect, restarting at 1 again, which is unhelpful.</p>			
Chapter 15: Environmental Management, Mitigation and Monitoring and ES Addendum Section	Given that each of the relevant chapters of the ES have already set out the mitigation requirements for significant effects identified, it is concluded that this chapter is not strictly necessary to meet the requirements of the Regulations.	<p>A number of minor inconsistencies and errors are noted in the May 2022 ES as follows, which have not been corrected by way of the Addendum:</p> <p>The format and layout of this chapter could be improved to aid the reader. It should be noted that a number of the mitigation measures summarised are for inherent (Primary) mitigation measures, particularly those for lighting measures with respect to bats, and those pertaining to building plant noise.</p> <p>The layout of the tables seems repetitive, particularly for construction phase impacts, this text could be presented more concisely to aid the reader.</p> <p>The mechanism to ensure the delivery of the mitigation measures is not clearly set out, which is the same as in the technical chapters. This would be a helpful addition to ensure decision makers are aware of how mitigation is to be delivered, and whether they require to make conditions to this effect.</p> <p>A number of proposed mitigations appear difficult to achieve and / or lack sufficient clarity. It is recommended that LBI carefully review the acceptability of these, particularly if a condition is to be attached to any future planning permission. As an example, the suggestion that lighting for the multi-use games area (MUGA) can only be used at times of the year when bats are not active is unlikely to be acceptable to the end user.</p> <p>Changes in the proposed mitigations are clearly set out in the ES Addendum. However, the figure included as 1.1, is incorrect, and this</p>	Pass	None	<p>It would aid the reader if the numbering of the paragraphs in this section was updated.</p> <p>It would aid the reader if the correct figure could be provided.</p>

Section of the ES	Review of compliance	Technical Review	Overall Review Conclusion ('Grade')	Information to be provided under Regulations 25	Clarifications
		<p>should be the figure that is included as 11.11.</p> <p>The numbering of this section of the Addendum is incorrect, restarting at 1 again, which is unhelpful.</p>			
<p>May 2022 ES Non-Technical Summary (NTS) and Replacement ES Addendum NTS</p>	<p>The Non-Technical Summary is considered to be compliant with the requirements of Schedule 4 of the EIA Regulations as set out in Table 1 above.</p>	<p>Whilst acknowledging that there is some uncertainty within the industry, as to what level of information is required within a Non-Technical Summary (NTS), the May 2022 NTS was quite lengthy at 45 pages, this comment has not been in the replacement NTS (which is 64 pages). The length and detail provided could make the document less accessible to stakeholders, particularly members of the public.</p> <p>The mix of graphics and text generally assist the reader, however, a number of plans were missing orientation indicators. Within a number of areas the level of information provided rose above that that would normally be considered non-technical, and in some instances provided detail that was not included in the main ES text. Summary tables were clear and accessible, however, the repetition of these at the end of the document is unnecessary.</p> <p>On a number of occasions, the NTS loses objectivity.</p> <p>Paragraph 1.100 does not indicate that the replacement NTS is located as Volume 4 of the ES Addendum. Table 1.15 also missing to mention where the replacement NTS can be located.</p> <p>The ES Addendum is accompanied by a replacement NTS, this approach is considered appropriate. It would be helpful if reason was clearly set out, that is amendments / substitutions to an unapproved scheme. It would be helpful if the relationship of the ES and the ES addendum was clarified.</p>	<p>Pass</p>	<p>None</p>	<p>None</p>
<p>ES Volume 2 (Built) Heritage, Townscape and Visual Impact Assessment (HTVIA) and the addendum assessment.</p>	<p>The ES Volume 2 (Built) Heritage, Townscape and Visual Impact Assessment and the Addendum Assessment are considered to be compliant with the requirements of Schedule 4 of the EIA Regulations as set out in Table 1 above.</p>	<p>Overall, the HTVIA is considered to be very comprehensive, and further clarifications have been provided in the Addendum that address many of the minor comments and observations noted within the Draft ES Review.</p> <p>List of references either at the front or back end of the assessment or as footnotes is not provided, this would be useful if provided.</p> <p>The ES Addendum addresses the scheme changes appropriately and reports the findings in a concise manner.</p>	<p>Pass</p>	<p>None</p>	

UK and Ireland Office Locations

